

**REMARKS**

Claims 1, 2, 5-9, 11, 13, 16-29, and 31-35 are pending in the present application. Claims 4, 14, 15, and 30 are hereby canceled. Claims 1, 5-8, 11, 16, 18, 21, 23-28, and 32 have been amended. Claim 35 is new. Claims 1, 8, and 35 are independent claims. The Examiner is respectfully requested to reconsider the outstanding rejections in view of the above amendments and the following remarks.

***Drawings***

It is gratefully acknowledged that the Official Draftsperson has approved the Formal Drawings filed by the Applicants on September 6, 2005.

***Telephone Interview on May 17, 2006***

Applicants wish to thank Examiner Ephrem Alemu and Primary Examiner Tuyet Vo for taking the time to conduct a telephonic interview with Applicants' representative, Jason Rhodes (Reg. No. 47,305), on May 17, 2006. The substance of the interview is provided below.

**Claims Discussed:** Claim 1 was discussed. Also, proposed new claim 35 was discussed.

**Prior Art Discussed:** U.S. Patent No. 6,717,372 to Lin et al. (hereafter "Lin").

**Proposed Amendments:** Applicants proposed an amendment to claim 1.

**General Results:** No agreement was reached on the proposed amendment of claim 1. However, the Examiner stated that claim 1 would be allowable if it were amended to include features illustrated in Fig. 2, 3, or 4. No agreement was reached as to proposed new claim 35.

***Rejection Under 35 U.S.C. § 112: Indefiniteness***

Claims 1, 2, 4-9, 11, and 13-34 stand rejected under 35 U.S.C. 112, 2<sup>nd</sup> Paragraph, as being indefinite. This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

Initially, Applicants point out that claims 4, 14, 15, and 30 have been canceled above, thereby rendering the rejection of these claims moot.

**Claim 1**

The Examiner asserts that “said parasitic capacitances are backlights being added” is indefinite. This phrase has been replaced with --said parasitic capacitances *being generated in response* to said backlights being added-- (emphasis added).

The Examiner also asserts that “the discharge lamps placed in said backlights” is indefinite. Claim 1 has been amended to recite that discharge lamps are arranged as backlights. Thus, the aforementioned phrase has been replaced with --the discharge lamps *arranged as* said backlights-- (emphasis added).

In view of the above amendments, Applicants request the Examiner to withdraw this rejection in connection with claim 1.

**Claims 8, 18, and 19**

The Examiner asserts that it is unclear how to connect the two shunt coils of the single shunt transformer of claim 1 to form the multi-tier structure recited in claims 8, 18, and 19.

As amended, claims 8 and 18 now recite, “a shunt circuit is formed by arranging a plurality of shunt transformers such that shunt coils of the plurality of shunt transforms are connected to form a multi-tier structure.” Applicants respectfully submit that it would clear to one of ordinary skill in the art, in view of the present disclosure and figures, how the shunt coils

of a plurality of shunt transformers may be arranged to form the multi-tier structure in claims 8 and 18.

Furthermore, claim 1 has similarly been amended to recite, “a shunt circuit is formed by arranging a plurality of shunt transformers such that the shunt coils of the plurality of shunt transforms are connected to form a multi-tier structure.” Since claim 19 is now dependent on claim 1, Applicants respectfully submit that it is clear how to form the multi-tier structure of claim 19.

### **Claims 13, 29, 32, and 34**

The Examiner asserts that “said two coils of each shunt transformer” is indefinite because these claims depend from claim 1 and only a single shunt transformer is recited in claim 1. In response, Applicants point out that claim 1 has been amended to recite a plurality of shunt transformers. Thus, dependent claims 13, 29, and 32 are not indefinite for reciting “each shunt transformer.” Similarly, claim 8 has been amended to recite a plurality of shunt transformers. Thus, dependent claim 34 is not indefinite for reciting “each shunt transformer.”

### **Claim 21**

The Examiner asserts that it is not clear how to connect the three coils of the single shunt transformer in claim 6 to form the multi-tier structure of claim 21. As amended, claim 21 now recites “a shunt circuit is formed by arranging a plurality of shunt transformers such that shunt coils of the plurality of shunt transforms are connected to form a multi-tier structure.” In view of the present disclosure, Applicants submit it would be clear to one of ordinary skill in the art how to arrange the shunt coils of a plurality of shunt transformers to form a multi-tier structure.

**Rejection Should be Withdrawn**

In view of the above amendments and remarks, Applicants respectfully request the Examiner to withdraw the § 112 rejection for indefiniteness.

***Rejection Under 35 U.S.C. § 112: Omitting Essential Structural Relationships***

Claims 4-8, 16, and 24-28 stand rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential structural relationships of various elements.

Initially, Applicants point out that the rejection of claim 4 has been rendered moot by virtue of its cancellation.

**Claims 5, 7, and 16**

The Examiner asserts that there are no structural connections between the discharge lamps of claim 1 and the plurality of shunt transformers in claims 5 and 7. Applicants respectfully submit that claims 5 and 7 have been amended to more clearly recite the relationship between the discharge lamps and the shunt transformers.

**Claim 6**

The Examiner asserts that there is no structural connection between the three or more coils of claim 6 and the discharge lamps of claim 1. Applicants respectfully disagree, pointing out that claim 6 recites, “whereby respective lamp currents of discharge lamps connected to said coils.” Applicants submit that this recitation provides a structural connection.

**Claim 8**

The Examiner asserts that there is no structural connection between the shunt coils of claim 8 and the discharge lamps of claim 1. Claim 8 has been amended to recite, “shunt coils

associated with at least one tier in the multi-tier structure being operably connected to the discharge lamps,” which provides a structural connection.

**Claims 24-28**

The Examiner asserts that these claims lack a structural relationship between the winding of said shunt transformer and the plurality of discharge lamps. Applicants respectfully submit that the amendments to independent claims 1 and 8 (from which claims 24-28 depend) provide such a structural relationship.

**Rejection Should be Withdrawn**

In view of the above amendments and remarks, Applicants respectfully request the Examiner to withdraw the § 112 rejection for omitting essential structural relationships.

***Prior Art Rejections***

Claims 1, 2, 6, and 17 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Lin. Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin. Claim 9 also stands rejected under § 103(a) as being unpatentable over Lin in view of U.S. Patent Application Publication No. 2003/0137222 to Takeda (hereafter “Takeda”). In addition, claims 13 and 29 stand rejected under § 103(a) as being unpatentable over Lin in view of U.S. Patent Application Publication No. 2002/0140538 to Yer et al. (hereafter “Yer”). These rejections, insofar as they pertain to the presently pending claims, are respectfully traversed.

Initially, Applicants point out that the rejection of claim 14 has been rendered moot by the cancellation thereof.

Applicants further point out that no prior art rejection was applied by the examiner to claim 4, implicitly indicating that claim 4 distinguishes over the above-cited references. In order to expedite prosecution, Applicants have elected to cancel claim 4 and incorporate its features

into independent claim 1. At least for this reason, Applicants respectfully submit that the Examiner should withdraw the prior art rejection of claim 1.

Applicants respectfully submit that an indication by the Examiner that claim 1 is allowable over the cited references is consistent with the agreement reached by the Examiner and Applicants' representative during the telephone interview, as indicated in the Substance of the Interview above. Furthermore, Applicants submit that claims 2, 6, 9, 13, and 17 are allowable over the cited references at least by virtue of their dependency on claim 1.

In view of the aforementioned, Applicants respectfully request the Examiner to reconsider and withdraw the above prior art rejections.

***New Claim***

It is respectfully submitted that new claim 35 recites a combination of elements neither taught nor suggested by the prior art of record. Thus, Applicants submit that claim 35 is in condition for allowance.

***Conclusion***

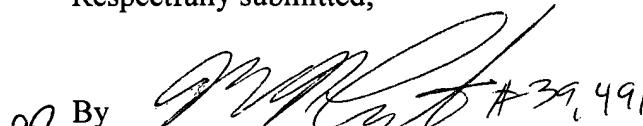
All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request the Examiner to reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

However, should the Examiner believe that any outstanding matters remain in the present application, the Examiner is respectfully requested to contact Jason W. Rhodes (Reg. No. 47,305) at the telephone number of the undersigned to discuss the present application in an effort to expedite prosecution.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Dated: June 28, 2006

Respectfully submitted,

By   
Marc S. Weiner  
Registration No.: 32,181  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
8110 Gatehouse Road  
Suite 100 East  
P.O. Box 747  
Falls Church, Virginia 22040-0747  
(703) 205-8000  
Attorney for Applicant